

Bryan F. Aylstock (FL, AL, MS)*
Justin G. Witkin (FL, MS)
Douglass A. Kreis (FL)
Neil D. Overholtz (FL) (1972-2022)
R. Jason Richards (FL, CO)
Bobby J. "Brad" Bradford (FL, AL)
Stephen H. Echsner (FL)
D. Renée Baggett (FL)†
Daniel J. Thornburgh (FL, MN)
Nathan C. Bess (FL)†
Alexandra B. Echsner-Rasmussen (FL)

* States in which attorney is licensed to practice law
† Of counsel



AYLSTOCK WITKIN KREIS OVERHOLTZ

www.AWKOLAW.com

17 East Main Street, Suite 200 • Pensacola, Florida 32502
Phone: (850) 202-1010 • Fax: (850) 916-7449

E. Samuel "Sam" Geisler (FL, IL)
Jennifer M. Hoekstra (LA)
Chelsie R. Warner (MT, NV, WA)
S. Mary Liu (CA, FL)
Samantha M. Katen (FL, NC, CO)
Caitlyn P. Miller (FL, AL)
D. Nicole Guntner (FL, NY)
Marybeth Putnick (DE, NJ)†
Hannah R. Pfeiffer (FL)
Catherine A. Mitchell (AL)
Timothy J. Inacio (FL)
Maury S. Goldstein (FL)

October 20, 2022

The Honorable Yvonne Gonzales Rogers
United States District Court for the Northern District of California
1301 Clay Street
Oakland, CA 94612

Re: *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*,
MDL No. 3047

Dear Judge Gonzalez Rogers:

Pursuant to this Honorable Court's Order Setting Initial Conference in MDL 3047, I respectfully file this application for appointment to the Plaintiffs' Steering Committee ("PSC") of the Social Media Adolescent Addiction/Personal Injury Products Liability Litigation ("Social Media Litigation"). I am a partner with the firm Aylstock, Witkin, Kreis & Overholtz, and I am willing and available to serve in whatever capacity this Honorable Court sees fit. Over the course of my legal career, I have demonstrated the ability to work cooperatively with all parties, and I possess all the requisite professional experience and organizational skills to advance this litigation toward resolution. As a member of the PSC, I will completely dedicate myself and my practice to meeting (if not exceeding) the obligations required by this role. Although my firm is located in Florida, I am based on the West Coast and only a few hours' drive from the Ronald V. Dellums Federal Building and U.S. Courthouse.

For over a decade, I have litigated diverse, complex childhood sexual abuse and product liability matters. Since 2019, I have led our firm's complex institutional childhood sexual abuse litigation. More specifically, I lead our firm's litigation in the *Southern California Clergy Cases*, JCCP 5101, *Northern California Clergy Cases*, JCCP 5108, *In re: The San Diego Diocese Cases*, JCCP 5105, and other similarly consolidated state court cases in New York and New Jersey where I am admitted *pro hac vice*. I lead a team of attorneys and staff members to advance the litigation toward a swift and just resolution for our clients. I work closely and coordinate with the Court-appointed Plaintiffs' Liaison Counsels to further these litigations.

Because we are passionate about protecting children, my firm has dedicated significant resources to the Social Media Litigation, and we have the necessary financial and human capital resources to see the litigation to conclusion. We have committed multiple highly experienced partners, associates, and staff members within my firm to the Social Media Litigation, and will dedicate whatever additional resources are needed to effectively manage this litigation. Furthermore, I have championed our firm to work with other Plaintiffs' firms who are equally committed to protecting children and dedicated to providing the necessary resources to advance this litigation to resolution. To that end, our firm has partnered with the Marsh Law Firm and Hach & Rose to jointly represent hundreds of children who have been sexually exploited as a result of their addiction to social media. Our partnership is founded on our shared passion and experience advocating for survivors of childhood sexual exploitation.

I have been at the forefront of litigation involving the Communications Decency Act § 230 (“CDA 230”) since 2017. I was co-counsel in *Dyroff v. Ultimate Software Group, Inc.*, Case No. 17-cv-05359, which involved CDA 230 questions. In pursuit of my dedication to advancing the issues involving CDA 230, I established the American Association for Justice CDA Section 230 Litigation Group in 2018. I continue to serve as Co-Chair of this litigation group. I have also presented on CDA 230 at various conferences and webinars over the past four years. Further, I recently joined Child USA and the Rape, Abuse & Incest National Network (RAINN) in an *amicus curiae* brief that was filed in support of the plaintiffs in *Doe v. Twitter, Inc.*, Case No. 21-cv-000485, which involved CDA 230 and Trafficking Victims Protection Reauthorization Act (TVPRA) questions.

In addition to my experience in complex litigation, my prior experience in the legal field provides for a unique perspective for leading the Social Media Litigation. Between 2010 and 2011, I served as an Assistant Attorney General representing the State of Florida and the Department of Children and Families in dependency matters. I encountered numerous instances of children in crisis and children at risk, and in representing the state, our goal was to advocate for the best interest of the child. I believe that this experience is of paramount importance to the Social Media Litigation because it is anticipated that most of the Plaintiffs in this litigation will be minor children and their parents. To that end, I also practiced family law and handled child custody, support, and visitation matters. Finally, prior to entering the legal field, I spent thirteen years in the ecommerce, high-tech consulting, biotechnology, employment, management consulting, utilities, and publishing industries, which gives me diverse professional experience and a unique background.

As an advocate for children’s legal issues, I was appointed to the Board of Directors for Child USA in April 2022. Child USA is a non-profit organization whose mission is to employ in-depth legal analysis and cutting-edge social science research to protect children, prevent future abuse and neglect, and bring justice to survivors. Child USA fights for the rights of children to be free from childhood sexual abuse through legal reform of the statutes of limitation and federal bankruptcy law, ending child marriage, and holding institutions accountable. Child USA also fights for children’s access to quality medical care and education. As a champion of children’s legal issues, I am proud to support Child USA in all of their endeavors through my role as a member of the Board of Directors.

In addition to my work as an advocate for children, I have over a decade of experience working on complex pharmaceutical, medical device, and institutional childhood sexual abuse cases through various MDLs, state court consolidations, and individually filed cases. In early 2012, I began working on complex litigations such as *In re: Ethicon, Inc., Pelvic Repair System Products Liability Litigation*, MDL 2327. In October 2012, I was one of four attorneys appointed Document Review Team Lead over Ethicon’s document productions with over 6.3 million documents, consisting of close to 50 million pages. In this role, I specifically led the Defective Manufacturing/Materials Document Review Team, wherein I managed nineteen document reviewers. Additionally, I deposed numerous corporate, liability, expert, and fact witnesses throughout the pendency of the Ethicon MDL. I also recruited and developed Plaintiffs’ experts, and I piloted meet and confers with defense counsel to successfully resolve pre-trial disputes and discovery issues. I also educated other Plaintiffs’ firms on the Ethicon litigation by presenting at seminars that were organized by the PSC. In addition to the extensive pre-trial workup for the Ethicon MDL, I provided trial assistance during the Bellwether trial of *Lewis v. Johnson & Johnson*, Case No. 2:12-cv-04301.

While I was working on the Ethicon MDL, I significantly contributed to several other MDLs and state coordinated proceedings in a similar capacity, including: *In Re: C. R. Bard, Inc., Pelvic Repair System Products Liability Litigation*, MDL 2187; *In Re: Mentor Corp. Obtape Transobturator Sling Products Liability Litigation*, MDL 2004; *In Re: Zoloft (Sertraline Hydrochloride) Products Liability Litigation*, MDL 2342; *In Re: Fluoroquinolone Products Liability Litigation*, MDL 2642; *In Re: Mirena IUD Products Liability Litigation*, MDL 2434; and *Essure Product Cases*, JCCP 4887. While I have worked extensively in these MDLs, I have not previously been appointed to an official leadership position in a MDL. However, my firm has extensive leadership experience with a large number of MDLs, and my partners have appeared before numerous MDL judges over the past two decades. I expect to draw on my experiences litigating across multiple MDLs as well as the extensive MDL leadership experience of my partners (as described more fully in my attached resume) to be an effective leader in this MDL.

I earned my Bachelor of Science degree at the University of Florida and attended Nova Southeastern University Shepard Broad College of Law where I graduated *summa cum laude* with my Juris Doctor degree. I am presently licensed to practice before all State Courts in California and Florida as well as the Supreme Court of the United States, the United States Court of Appeals for the Ninth Circuit, the United States District Courts for the Northern, Central, Southern, and Eastern Districts of California, and the United States District Courts for the Southern and Middle Districts of Florida.

As a member of the PSC, I will always endeavor to lead through example and hard work. I understand that leading a litigation is not just the appointment of a title, but a great responsibility to ensure that the hard work of complex litigation gets accomplished through a subtle mix of providing direction and support, setting expectations and ensuring they are met, ensuring team members receive assignments commensurate with their skills, working through failures, celebrating successes, and a whole lot of rolling up my sleeves and simply getting to work. I am committed to leading from the front and understand that will likely entail staying up until the wee hours of the morning finalizing the master complaint, drafting or editing briefs, preparing for depositions, and anything else needed to further this Social Media Litigation. Over the past several months, I have been working collaboratively and cohesively with many of the highly experienced Plaintiffs' Attorneys in this litigation, and I am currently a Co-Chair of our Master Complaint Committee and a member of our Legal Issues Committee where we champion an unmatched esprit de corps. As such, and as directed by this Honorable Court, I am attaching a list of other counsel in this MDL who support my appointment to the PSC.

In conclusion, I believe that I possess the requisite professional knowledge, experience, and skills necessary to be appointed to the PSC. While my experience has conferred upon me a wealth of substantive and procedural legal knowledge, it has also engrained in me the ability to facilitate cooperation across co-counsel and opposing counsel. I have demonstrated my willingness and availability, as well as my firm's willingness and availability, to work cooperatively with all counsel involved, and my commitment and my firm's commitment to this litigation. I consider the opportunity to serve as a member of the PSC in the Social Media Litigation a tremendous honor and great responsibility. If I am appointed, I will continue to work hard day in and day out to fulfill my duties as set forth by the Court.

Respectfully Submitted,



Sin-Ting Mary Liu



SIN-TING MARY LIU



EXPERIENCE

AYLSTOCK WITKIN KREIS & OVERHOLTZ, Partner (2012 – Present)

Trilingual California and Florida licensed attorney with vast experience in a variety of roles in MDLs and state court coordinated proceedings over the past decade, including recruitment and retention of key experts, preparation for Bellwether trials, depositions of corporate and liability witnesses, motion practice, leading large document review teams, and assisting co-counsel with Cantonese or Mandarin speaking clients. Currently leading the firm's Childhood Sexual Exploitation and Social Media Products Liability litigations.

LIU FAMILY LAW, Founder (2012 – 2013)

Established a successful family law practice in Orange County, California, representing clients in cases involving child custody and visitation, child support, grandparent visitation, pre-marital agreements, and dissolution of marriage and domestic partnerships.

IRVINE UNIVERSITY, COLLEGE OF LAW, Assistant Professor of Law (2011 – 2013)

Instructed law students on California Community Property and Federal Civil Procedure. Designed and developed curriculum and exam materials to optimize learning and understanding of legal concepts and analysis of facts to the law.

STATE OF FLORIDA, OFFICE OF THE ATTORNEY GENERAL, Assistant Attorney General (2010 – 2011)

Represented the State of Florida and the Department of Children and Families in civil prosecutions involving abuse, abandonment, and/or neglect of minor children.

PRIOR EXPERIENCE (1995 – 2007)

Prior to entering the legal field in 2010, thirteen years of professional experience in the ecommerce, high-tech consulting, biotechnology, employment, management consulting, utilities, and publishing industries.

EDUCATION

NOVA SOUTHEASTERN UNIVERSITY, SHEPARD BROAD COLLEGE OF LAW, Fort Lauderdale, FL

J.D., June 2010 (*summa cum laude*)

UNIVERSITY OF FLORIDA, Gainesville, FL

B.S. in Advertising and Minor in East Asian Languages and Literature – Chinese Track, December 1994

SPEAKING ENGAGEMENTS AND PROFESSIONAL AFFILIATIONS

HARRISMARTIN NATIONAL CONFERENCE – Presentation on Sexual Assault/Human Trafficking/Child Sexual Abuse Material (CSAM) in Social Media (St. Louis, MO – September 2022)

AMERICAN ASSOCIATION FOR JUSTICE (AAJ) – Webinar on Accountability Despite CDA 230 (April 2022)

AAJ ANNUAL CONFERENCE – Presentation on CDA Section 230 (Denver, CO – July 2018)

CHILD USA – Board of Directors (2022 – present)

AAJ CDA SECTION 230 LITIGATION GROUP – Co-Chair (2018 – present)

NATIONAL CRIME VICTIMS BAR ASSOCIATION – Member (2019 – present)

BAR ADMISSIONS

All California and Florida State Courts

Supreme Court of the United States

United States Court of Appeals for the Ninth Circuit

United States District Courts for the Northern, Central, Southern, and Eastern Districts of California

United States District Courts for the Southern and Middle Districts of Florida

FIRM INFORMATION

With twenty-four attorneys and over three hundred staff members, Aylstock, Witkin, Kreis, & Overholtz (AWKO) has the resources, infrastructure, and experience to prosecute even the most complex national litigations. The firm utilizes a robust case management database designed for use in complex litigation, which can track client communications, written pleadings, correspondence, and other case information for tens of thousands of matters and clients. AWKO employs an on-site IT team of database administrators, software developers, and network administrators to remain on the cutting edge of litigation and claims administration technology.

Courts around the country have appointed AWKO's attorneys to positions of leadership in a variety of national litigations, including serving as the Lead Counsel in the 3M Combat Arms Earplug Product Liability Litigation before the Honorable M. Casey Rodgers and as one of three court-appointed Coordinating Co-Lead Counsel overseeing the Plaintiffs' Steering Committees (PSC) in seven different MDLs before the Honorable Joseph R. Goodwin in the Trans-Vaginal Mesh Litigation involving over 86,000 filed cases. Other notable examples include:

- Co-Lead Counsel – Recalled Abbott Infant Formula Liab. Litig., MDL 3037
- Co-Lead Counsel – Ethicon, Inc., Pelvic Repair System Prod. Liab. Litig., MDL 2327
- Co-Lead Counsel – Mentor Corp. Obtape Transobturator Sling Prod. Liab. Litig., MDL 2004
- Co-Lead Counsel – Viagra Prod. Liab. Litig., MDL 1724
- Co-Lead Counsel and Co-Chair of Discovery Committee – Avandia Marketing Sales Practices and Products Litig., MDL 1871
- Co-Lead Counsel and Executive Committee Member – Effexor (Venlafaxine Hydrochloride) Products Liab. Litig., MDL 2458
- Liaison Counsel – Abilify Products Liab. Litig., MDL 2734
- Plaintiffs' Executive Committee - Elmiron (Pentosan Polysulfate Sodium) Prods. Liab. Litig., MDL 2973
- Plaintiffs' Executive Committee and Co-Chair – Proton-Pump Inhibitor Prod. Liab. Litig., MDL 2789
- Plaintiffs' Executive Committee – Incretin Mimetics Prod. Liab. Litig., MDL 2452
- Plaintiffs' Executive Committee – Pradaxa (Dabigatran Etexilate) Prod. Liab. Litig., MDL 2385
- Coordinating Counsel – Zoloft (Sertraline Hydrochloride) Prod. Liab. Litig., MDL 2342
- Plaintiffs' Steering Committee and Settlement Review Committee – Actos (Pioglitazone) Product Liab. Litig., MDL 2299
- Plaintiffs' Steering Committee – Stryker Rejuvenate and ABGII Hip Implant Prod. Liab. Litig., MDL 2441
- Plaintiffs' Steering Committee – Ethicon, Inc. Power Morcellator Prod. Liab. Litig., MDL 2652
- Plaintiffs' Steering Committee – Xarelto (Rivaroxaban) Prod. Liab. Litig., MDL 2592
- Plaintiffs' Steering Committee – Zimmer NexGen Knee Implant Prod. Liab. Litig., MDL 2272
- Plaintiffs' Steering Committee – Biomet M2a Magnum Hip Implant Prod. Liab. Litig., MDL 2391
- Plaintiffs' Steering Committee – Stryker Rejuvenate and ABGII Hip Implant Prod. Liab. Litig., MDL 2441
- Plaintiffs' Steering Committee – Fleet Oral Sodium Phosphate Litig., MDL 2066
- Plaintiffs' Steering Committee – Trasylol Prod. Liab. Litig., MDL 1928

Additionally, Judges nationwide have routinely appointed AWKO attorneys to committees and subcommittees with diverse roles and responsibilities too numerous to set forth comprehensively herein.

Bryan F. Aylstock (FL, AL, MS)*
Justin G. Witkin (FL, MS)
Douglass A. Kreis (FL)
Neil D. Overholtz (FL) (1972-2022)
R. Jason Richards (FL, CO)
Bobby J. "Brad" Bradford (FL, AL)
Stephen H. Echsner (FL)
D. Renée Baggett (FL) †
Daniel J. Thornburgh (FL, MN)
Nathan C. Bess (FL)†
Alexandra B. Echsner-Rasmussen (FL)

* States in which attorney is licensed to practice law

† Of counsel



**AYLSTOCK WITKIN
KREIS OVERHOLTZ**

www.AWKOLAW.com

17 East Main Street, Suite 200 • Pensacola, Florida 32502
Phone: (850) 202-1010 • Fax: (850) 916-7449

E. Samuel "Sam" Geisler (FL, IL)
Jennifer M. Hoekstra (LA)
Chelsie R. Warner (MT, NV, WA)
S. Mary Liu (CA, FL)
Samantha M. Katen (FL, NC, CO)
Caitlyn P. Miller (FL, AL)
D. Nicole Guntner (FL, NY)
Marybeth Putnick (DE, NJ)†
Hannah R. Pfeiffer (FL)
Catherine A. Mitchell (AL)
Timothy J. Inacio (FL)
Maury S. Goldstein (FL)

**Support for Appointment of Sin-Ting Mary Liu to the
*In Re: Social Media Adolescent Addiction/Personal Injury Products Liability
Litigation*, MDL No. 3047, Plaintiffs' Steering Committee**

Attorney

Lexi Hazam
Emily Jeffcott
Chris Seeger
Joseph VanZandt
Jennie Anderson
Ron Austin
Matt Bergman
James Bilsborrow
Paige Boldt
Tom Cartmell
Jayne Conroy
Kirk Goza
Andre Mura
Emmie Paulos
Roland Tellis
Alexandra Walsh
Previn Warren
Michael Weinkowitz
James Marsh
Margaret Mabie
Hillary Nappi
Ruth Rizkalla

Firm

Lieff Cabraser
Morgan & Morgan
Seeger Weiss
Beasley Allen
Andrus Anderson
Ron Austin Law
Social Media Victims Law Center
Weitz Luxenberg
Watts Guerra
Wagstaff Cartmell
Simmons Hanly Conroy
Goza & Honnold
Gibbs Law Group
Levin, Papantonio, Rafferty
Baron & Budd
Walsh Law
Motley Rice
Levin, Sedran & Berman
Marsh Law Firm
Marsh Law Firm
Hach & Rose
The Carlson Law Firm